

## **EXHIBIT 2**

# CASE SUMMARY

## CASE NO. 2019CVK002461D4

ESPERANZA PEREZ  
VS.  
DOCTORS HOSPITAL OF LAREDO

§ Location: 406th District Court  
§ Judicial Officer: Hale, O. J., Jr.  
§ Filed on: 12/10/2019  
§

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### CASE INFORMATION

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Case Type: All Other Civil Cases (DC)  
Subtype: Other (DC)

DATE	CASE ASSIGNMENT
	<p><b>Current Case Assignment</b></p> <p>Case Number 2019CVK002461D4          Court 406th District Court          Date Assigned 12/10/2019          Judicial Officer Hale, O. J., Jr.</p>

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### PARTY INFORMATION

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Defendant	DOCTORS HOSPITAL OF LAREDO	<i>Lead Attorneys</i> <b>CASTILLO, EDWARD J</b> <i>Retained</i> 956-618-0115(W)
	DOE 1, JANE	
	DOE 2, JANE	
	UNIVERSAL HEALTH SERVICES INC.	
Plaintiff	MARTINEZ, GUILLERMO	<b>GARCIA, BALDEMAR, Jr.</b> <i>Retained</i> 956-727-4441(W)
	PEREZ, ESPERANZA	<b>GARCIA, BALDEMAR, Jr.</b> <i>Retained</i> 956-727-4441(W)

DATE	EVENTS & ORDERS OF THE COURT	INDEX
12/10/2019	Civil Case Filed (OCA)	
12/10/2019	✉ Original Petition <i>ORIGINAL PETITION. (DV)</i>	
12/10/2019	Jury Demand <i>JURY DEMAND REQUESTED AND PAID BY ATTORNEY BALDEMAR GARCIA. (DV)</i>	
12/16/2019	✉ Calendar Call <i>FAXED THE CALENDAR CALL TO ATTORNEY BALDEMAR GARCIA.(DV)</i>	
12/16/2019	✉ Citation-Issuance <i>(2)CITATIONS ISSUED AS TO DOCTORS HOSPITAL OF LAREDO AND PLACED IN THE PRIVATE SERVERS BOX. (DV)</i>	
12/16/2019	Citation DOCTORS HOSPITAL OF LAREDO Served: 12/20/2019	

# CASE SUMMARY

## CASE NO. 2019CVK002461D4

12/16/2019	Citation-Issuance <i>(2) CERTIFIED MAIL CITATIONS ISSUED AS TO UNIVERSAL HEALTH SERVICES INC. AND SENT VIA CERTIFIED MAIL. (DV)</i>
12/16/2019	<b>Citation</b> UNIVERSAL HEALTH SERVICES INC. Unserved
12/20/2019	Citation Return-Executed <i>CITATION RETURN EXECUTED AS TO DOCTORS HOSPITAL OF LAREDO (DATE OF SERVICE (12/20/2019)</i>
01/08/2020	Atty Request - Miscellaneous <i>LETTER TO CLERK REQUESTING COPIES</i>
01/09/2020	Atty Request - Copies <i>LETTER TO CLERK REQUESTING COPIES COPIES SENT TO ATTORNEY WITH PRE ADDRESSED FED EX LABEL</i>
03/30/2020	<b>Calendar Call (2:00 PM)</b> (Judicial Officer: Hale, O. J., Jr.)

DATE	FINANCIAL INFORMATION
<b>Defendant</b> DOCTORS HOSPITAL OF LAREDO	
Total Charges	16.00
Total Payments and Credits	16.00
<b>Balance Due as of 1/13/2020</b>	<b>0.00</b>
<b>Plaintiff</b> PEREZ, ESPERANZA	
Total Charges	447.00
Total Payments and Credits	447.00
<b>Balance Due as of 1/13/2020</b>	<b>0.00</b>



A true copy of the original I certify  
the 10th day of Jan 20 20  
ESTHER DEGOLLADO  
Clerk of the District Courts and  
County Court at Law Webb County Texas  
By Cynthia M. DeGollado Deputy

Cause No. \_\_\_\_\_

Esperanza Perez and Guillermo Martinez, individually, and on behalf of the estate of Isidro Martinez Perez, deceased, plaintiffs,	§	In the District Court
vs.	§	Judicial District
Doctors Hospital of Laredo, Universal Health Services, Inc., Nurse Jane Doe 1, and Nurse Jane Doe 2, defendants.	§	Webb County, Texas

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### Plaintiffs' Original Petition

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Now Come Esperanza Perez and Guillermo Martinez, individually, and as representatives of the estate of their deceased infant son, Isidro Martinez Perez, and file this their original petition against Doctors Hospital of Laredo, Universal Health Services, Inc., Nurse Jane Doe 1, and Nurse Jane Doe 2, and would respectfully show the Court as follows:

#### Discovery Control Plan

1. Plaintiffs request discovery be conducted under Level 2 according to Texas Rule of Civil Procedure 190.3.

#### Relief

2. Plaintiffs seek monetary relief over \$1,000,000.00. TEX. R. CIV. P. 47(c)(5).

Parties

3. Plaintiff Esperanza Perez is a natural person, Texas citizen, and resident of Webb County, Texas.
4. Plaintiff Guillermo Martinez is a natural person, Texas citizen, and resident of Webb County, Texas.
5. Defendant Doctors Hospital of Laredo is doing business in Texas, has its principal place of business in Laredo, Webb County, Texas, and may be personally served with process by citation issued for its president/registered agent, as follows:

Doctors Hospital of Laredo  
by serving its registered agent  
Jim Resendez, Chief Executive Officer,  
Raymond Ramos, Chief Operating Officer,  
Rebecca Garcia Hernandez, Assistant Chief Nursing Officer, or  
Mark A. Requena, Chief Financial Officer  
10700 McPherson Road  
Laredo, Texas 78045

6. Defendant Universal Health Services, Inc. is doing business in Texas, owns and operates Doctors Hospital of Laredo, and can be served with process by citation issued and to be served by certified mail, return receipt requested, by the Webb County District Clerk, as follows:

Universal Health Services, Inc.  
by serving its registered agent  
Corporation Service Company d/b/a CSC–Lawyers Incorporating Service Company  
211 E. 7<sup>th</sup> Street, Suite 620  
Austin, Texas 78701-3218

7. Defendant Nurse Jane Doe 1 is an unknown person working at Doctors Hospital of Laredo on the night of the incident made the basis of this suit.

8. Defendant Nurse Jane Doe 2 is an unknown person working at Doctors Hospital of Laredo on the night of the incident made the basis of this suit.

#### Venue

9. Venue of this suit in Webb County is proper because all or a substantial part of the acts and events giving rise to this health care liability claim occurred here. TEX. CIV. PRAC. & REM. CODE ANN. § 15.002 (West, Westlaw through 2019 Reg. Sess.).

#### Jurisdiction

10. This Court has subject-matter jurisdiction over the lawsuit the amount in controversy exceeds this Court's minimum jurisdictional requirements. TEX. CONST. ART. 5, § 8; TEX. GOV'T CODE ANN. §§ 24.007, 24.008 (West, Westlaw through 2019 Reg. Sess.).

#### Statement of Facts

11. Infant Isidro Martinez Perez died on the early morning of November 15, 2017, a few hours after an emergency room visit to Doctors Hospital of Laredo on the evening of November 14, 2017.

12. According to a law enforcement investigation, Julia Cruz, a Doctors Hospital administrator, confirmed the November 14<sup>th</sup> evening emergency room visit by baby Isidro and his parents, Esperanza Perez and Guillermo Martinez. Ms. Cruz advised law enforcement that a Doctors Hospital employee remembered seeing baby Isidro and his parents, but that no documentation of this visit exists.

13. According to Ms. Perez and Mr. Martinez, they arrived to a relatively empty Doctors Hospital emergency room on November 14, 2017 and were seen within ten to fifteen minutes of arrival. Their month-old son Isidro was seen by two female nurses at

approximately 10:00 p.m. They placed a small cuff on his toe, advised that his lungs and heart sounded fine, and stated that he did not have a fever. They recommended that healthy Isidro be taken home and not remain in the emergency room due so as not to be infected with a cold or virus.

14. At approximately 4:00 a.m. on November 15, 2017, baby Isidro Martinez Perez died. According to his autopsy and death certificate, the cause of death was acute bronchopneumonia.

15. After baby Isidro was pronounced dead at the emergency room of Laredo Medical Center, his parents were investigated by Child Protective Services. The suspicion was that Esperanza and Guillermo might have been responsible for the death of there one-month old son Isidro. The investigation exonerated both of them, and the autopsy proved that the cause of death was bronchopneumonia. During the CPS investigation, Doctors Hospital tried to avoid responsibility by claiming that Esperanza and Guillermo refused treatment for Isidro. Doctors Hospital also failed to document Isidro's emergency room visit.

#### Negligence

16. Defendants Doctors Hospital, Universal Health Services, and Nurses Jane Doe 1 and 2 committed negligence which was the proximate cause of the wrongful death of infant Isidro Martinez. This negligence includes failing to diagnose and treat baby Isidro's serious medical condition that caused his death a few hours later, as proven by his autopsy report. Defendants Doctors Hospital, Universal Health Service, Nurses Jane Doe 1 and 2 also negligently failed to document baby Isidro's emergency room visit, proven by their lack of any documentation. Defendants Doctors Hospital, Universal Health Services, and Nurses Jane Doe 1 and 2 were negligent in trying to cover-up and avoid responsibility for their misdiagnosis, mistreatment, and failure to document by falsely claiming that Isidro's parents

refused emergency medical treatment for their infant son, as stated in the CPS investigation report.

#### Negligence Per Se

17. Defendants Doctors Hospital, Universal Health Service, and Nurses Jane Doe 1 and 2 committed negligence per se by violating the laws that require the documentation of the provision of medical services, including but not limited to, the Emergency Medical Treatment and Active Labor Act (EMTALA). These regulations are designed to prevent a hospital's "dumping" or transferring of indigent patients that may not be able to pay for medical services. Defendants Doctors Hospital, Universal Health Service, and Nurses Jane Doe 1 and 2 either negligently violated EMTALA and other similar laws by failing to document baby Isidro's emergency room visit, or they intentionally refused to provide necessary medical care for financial reasons, resulting in baby Isidro's wrongful death. Regardless of the reason, defendants Doctors Hospital, Universal Health Service, and Nurses Jane Doe 1 and 2 have aggravated their wrongful conduct by falsely claiming that Esperanza and Guillermo refused emergency medical treatment for their infant son Isidro.

#### Malice/Gross Negligence

18. Defendants Doctors Hospital, Universal Health Service, and Nurses Jane Doe 1 and 2 committed malice and gross negligence that proximately caused the wrongful death of one-month old Isidro Martinez. The failure to diagnose and treat baby Isidro's life-threatening medical condition, and telling his parents that he was healthy and should go home to avoid getting sick, was committed with either with malice and gross negligence. The failure to document his emergency room visit was committed either with malice and gross negligence. If defendants Doctors Hospital, Universal Health Service, and Nurses Jane Doe 1 and 2 refused to provide medical treatment for financial reasons, such conduct was

committed with either malice or gross negligence. And the decision to cover up their negligent lack of treatment and negligent or intentional lack of documentation by claiming that baby Isidro's parents refused emergency medical treatment for their son was committed either with gross negligence or malice. Viewed objectively from the standpoint of defendants Doctors Hospital, Universal Health Service, and Nurses Jane Doe 1 and 2, their acts and omissions departed from the ordinary standard of care to such an extent that it created an extreme degree of risk of harming others, and they had actual subjective awareness of the risk involved and choose to proceed in conscious indifference to the rights safety, or welfare of others. The conduct of defendants Doctors Hospital, Universal Health Service, and Nurses Jane Doe 1 and 2 posed a likelihood of serious injury to baby Isidro and his parents

#### Conditions Precedent

19. All conditions precedent incident to filing this suit have been performed or have occurred. Notice of this health care liability claim has been provided.

#### Jury Demand

20. Plaintiffs demand a jury trial and tenders herewith the associated fee. Tex. R. Civ. P. 216.

#### Prayer

21. Wherefore, Premises Considered, plaintiffs Esperanza Perez and Guillermo Martinez, respectfully request the clerk of the Court to issue citation for defendants Doctors Hospital, Universal Health Service, and Nurses Jane Doe 1 and 2, and that they be served with process, and that after their answer or default, that the Court sets this matter for jury trial, and upon receipt of a verdict, enter a judgment that plaintiffs recover all pecuniary and non-pecuniary monetary damages, together with punitive damages, costs of court, pre and

post-judgment interest, and that plaintiffs be granted any further relief, both general and special, at law or in equity, to which they may be justly entitled to receive.

Respectfully submitted,

By: /s/Baldemar Garcia Jr.  
Baldemar Garcia Jr.  
Texas Bar No. 00790740  
bgarcia@personwhitworth.com  
Person Whitworth  
Borchers & Morales, LLP  
602 East Calton Road, 2<sup>nd</sup> Floor (78041)  
P. O. Drawer 6668  
Laredo, Texas 78042-6668  
voice 956.727.4441  
facsimile 956.727.2696  
attorneys for plaintiffs Esperanza Perez and  
Guillermo Martinez, individually and as representatives  
of the estate of Isidro Martinez Perez, deceased

Certificate of service

Plaintiffs' Original Petition was served by electronic filing and/or email notification on all attorneys of record on December 10, 2019. Tex. R. Civ. P. 21, 21a.

Edward J. Castillo  
Gonzalez Castillo, LLP  
1317 E. Quebec Avenue  
McAllen, Texas 78503  
voice 956.618.0115  
facsimile 956.618.0445  
law@valleyfirm.com  
ecastillo@valleyfirm.com

/s/Baldemar Garcia Jr.  
Baldemar Garcia Jr.



A True copy of the original I certify  
the 13th day of Jan 2020  
ESTHER DEGOLLADO  
Clerk of the District Courts and  
County Court at Law, Webb County, Texas  
By Andrea M. Lamp Deputy



TELEPHONE NO. (956) 523-4954  
FAX NO. (956) 523-5074

## Oscar J. Hale, Jr.

State District Judge  
406<sup>TH</sup> Judicial District Court  
1110 Victoria St., Suite 402  
Laredo, Texas 78040  
406@webbcountytexas.gov

December 16, 2019

CAUSE NO.: 2019CVK002461D4

STYLE: ESPERANZA PEREZ AND GUILLERMO MARTINEZ, INDIVIDUALLY  
AND ON BEHALF OF THE ESTATE OF ISIDRO MARTINEZ PERES, DECEASED  
VS

DOCTORS HOSPITAL OF LAREDO; UNIVERSAL HEALTH SERVICES INC.;  
JANE DOE 1; JANE DOE 2

Please take NOTICE that this case is set for **CALENDAR CALL** on 03/30/2020  
at 2:00 PM at the 406<sup>th</sup> District Court, 4<sup>th</sup> Floor, Webb County Justice Center.

All Calendar Call hearings will be in open court and on the record before the Honorable Judge Oscar J. Hale, Jr. Your presence is MANDATORY unless Counsel for Plaintiff(s) and Defendant(s) file a Joint Pre-Trial Guideline Order (PTGO) with all counsel signatures on the PTGO.

You may download the PTGO at our website: [www.Webbcountytexas.gov/DC406th/Forms](http://www.Webbcountytexas.gov/DC406th/Forms)

Counsel for Plaintiff(s) please note that if you fail to appear your case may be dismissed for lack of prosecution.

Counsel for Defendant(s) please note that if you fail to appear for calendar call, a pre-trial guideline order may be entered with or without your approval and/or signature.

If there are any questions regarding this matter please feel free to call our office at any time.

Cruz Maldonado  
Civil Court Coordinator



*D*  
A True copy of the original I certify  
the 13th day of Jan 2020  
ESTHER DEGOLLADO  
Clerk of the District Courts and  
County Court at Law, Webb County, Texas  
By Antonia M. Baca Deputy

**\*\* Transmit Confirmation Report \*\***

P.1  
WEBB CO DISTRICT CLERK Fax:956-523-5121

Dec 17 2019 04:18pm

Name/Fax No.	Mode	Start	Time	Page	Result	Note
97272696	Fax	17.04:17pm	0'53"	1	*OK	

**Oscar J. Hale, Jr.**



TELEPHONE NO. (956) 523-4954  
FAX NO. (956) 523-5074

State District Judge  
406<sup>th</sup> Judicial District Court  
1110 Victoria St., Suite 402  
Laredo, Texas 78040  
406@webbcountytexas.gov

December 16, 2019

CAUSE NO.: 2019CVK002461D4

STYLE: ESPERANZA PEREZ AND GUILLERMO MARTINEZ, INDIVIDUALLY  
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Cruz Maldonado  
Civil Court Coordinator



A True copy of the original I certify  
the 13<sup>th</sup> day of Jan 20 20  
ESTHER DEGOLLADO  
Clerk of the District Courts and  
County Court at Law, Webb County, Texas  
By Cynthia Maldonado Deputy

**RETURN**

2019CVK002461D4

**CITATION**

THE STATE OF TEXAS  
COUNTY OF WEBB

**CALENDAR CALL COURT DATE:**  
3/30/2020 AT 2:00 PM

NOTICE TO THE DEFENDANT: "YOU HAVE BEEN SUED. YOU MAY EMPLOY AN ATTORNEY. IF YOU OR YOUR ATTORNEY DO NOT FILE A WRITTEN ANSWER WITH THE CLERK WHO ISSUED THIS CITATION BY 10:00 A.M. ON THE MONDAY NEXT FOLLOWING THE EXPIRATION OF TWENTY DAYS AFTER YOU WERE SERVED THIS CITATION AND PETITION, A DEFAULT JUDGMENT MAY BE TAKEN AGAINST YOU."

**TO:** DOCTORS HOSPITAL OF LAREDO  
BY SERVING ITS REGISTERED AGENT: JIM RESENDÉZ, CHIEF EXECUTIVE OFFICER  
RAYOND RAMOS, CHIEF OPERATING OFFICER  
REBECCAA GARCIA HERNANDEZ, ASSISTANT CHIEF NURSING OFFICER OR  
MARK A. REQUENA, CHIEF FINANCIAL OFFICER  
10700 MCPHERSON RD  
LAREDO TX 78045

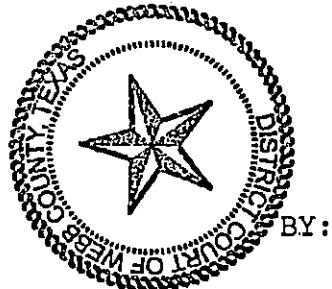
DEFENDANT, IN THE HEREINAFTER STYLED AND NUMBERED CAUSE, YOU ARE HEREBY COMMANDED TO APPEAR BEFORE THE 406th District Court of Webb County, Texas, to be held at the said courthouse of said county in the city of Laredo, Webb County, Texas, by filing a written answer to the Petition of Plaintiff at or before 10:00 O'CLOCK A.M. of the Monday next after the expiration of 20 days after the date of service thereof, a copy of which accompanies this citation, in the Cause #: 2019CVK002461D4, styled:

ESPERANZA PEREZ; GUILLERMO MARTINEZ, PLAINTIFFS  
VS.

DOCTORS HOSPITAL OF LAREDO; UNIVERSAL HEALTH SERVICES INC.;  
JANE DOE 1; JANE DOE 2, DEFENDANTS  
Said Plaintiff's Petition was filed on 12/10/2019 in said court by:  
BALDEMAR GARCIA, Jr., ATTORNEY FOR PLAINTIFF  
602 E CALTON RD FL 2  
LAREDO TX 78041

WITNESS ESTHER DEGOLLADO, DISTRICT CLERK OF WEBB COUNTY, TEXAS,  
Issued and given under my hand and seal of said court at office,  
on this the 16th day of December, 2019.

C L E R K   O F   C O U R T



BY:

Diana Vela

ESTHER DEGOLLADO  
WEBB COUNTY DISTRICT CLERK  
P.O. BOX 667  
LAREDO, TX 78042

DEPUTY

2019CVK002461D4

OFFICER'S RETURN

Came to hand on the \_\_\_\_\_ day of \_\_\_\_\_, 2019 at  
\_\_\_\_\_ O'CLOCK \_\_\_\_\_.M. Executed at  
\_\_\_\_\_, within the COUNTY of \_\_\_\_\_  
at \_\_\_\_\_ O'CLOCK \_\_\_\_\_.M. on the \_\_\_\_\_ day of \_\_\_\_\_  
\_\_\_\_\_, 2019, by delivering to the within named  
**DOCTORS HOSPITAL OF LAREDO**, each, in person, a true copy of this  
citation together with the accompanying copy of the petition,  
having first attached such copy of such petition to such copy of  
citation and endorsed on such copy of citation the date of  
delivery.

The distance actually travelled by me in serving such process  
was \_\_\_\_\_ miles, and my fees are as follows:

Total Fee for serving this citation \$ \_\_\_\_\_.

To certify which, witness my hand officially.

SHERIFF, CONSTABLE

\_\_\_\_\_ COUNTY, TEXAS

BY \_\_\_\_\_ DEPUTY

THE STATE OF TEXAS }  
COUNTY OF WEBB }

Before me, the undersigned authority, on this day personally  
appeared \_\_\_\_\_, who after being duly  
sworn, upon oath said that a notice, of which the above is a  
true copy, was by him/her delivered to  
\_\_\_\_\_ on the  
\_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_.

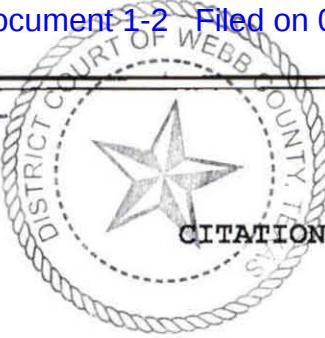
SWORN TO AND SUBSCRIBED BEFORE ME on the \_\_\_\_\_ day of  
\_\_\_\_\_, \_\_\_\_\_, to certify which witness my hand and  
seal of office.

*A True copy of the original I certify*  
the 13th day of Jan 202020  
ESTHER DEGOLLADO  
Clerk of the District Courts and  
County Court at Law, Webb County, Texas  
By Cynthia M. Lamp  
Deputy

NOTARY PUBLIC  
MY COMMISSION EXPIRES \_\_\_\_\_

A True copy of the original I certify

BTM day of Jan 20 2020  
 ESTHER DEGOLLADO  
 Clerk of the District Courts and  
 County Law Webb County Texas  
 Deputy  
 Ciprian Martinez  
 THE STATE OF TEXAS  
 COUNTY OF WEBB

**SERVE**

2019CVK002461D4

CALENDAR CALL COURT DATE:  
 3/30/2020 AT 2:00 PM

NOTICE TO THE DEFENDANT: "YOU HAVE BEEN SUED. YOU MAY EMPLOY AN ATTORNEY. IF YOU OR YOUR ATTORNEY DO NOT FILE A WRITTEN ANSWER WITH THE CLERK WHO ISSUED THIS CITATION BY 10:00 A.M. ON THE MONDAY NEXT FOLLOWING THE EXPIRATION OF TWENTY DAYS AFTER YOU WERE SERVED THIS CITATION AND PETITION, A DEFAULT JUDGMENT MAY BE TAKEN AGAINST YOU."

TO: DOCTORS HOSPITAL OF LAREDO  
 BY SERVING ITS REGISTERED AGENT: JIM RESENDEZ, CHIEF EXECUTIVE OFFICER  
 RAYOND RAMOS, CHIEF OPERATING OFFICER  
 REBECCAA GARCIA HERNANDEZ, ASSISTANT CHIEF NURSING OFFICER OR  
 MARK A. REQUENA, CHIEF FINANCIAL OFFICER  
 10700 MCPHERSON RD  
 LAREDO TX 78045

DEFENDANT, IN THE HEREINAFTER STYLED AND NUMBERED CAUSE, YOU ARE HEREBY COMMANDED TO APPEAR BEFORE THE 406th District Court of Webb County, Texas, to be held at the said courthouse of said county in the city of Laredo, Webb County, Texas, by filing a written answer to the Petition of Plaintiff at or before 10:00 O'CLOCK A.M. of the Monday next after the expiration of 20 days after the date of service thereof, a copy of which accompanies this citation, in the Cause #: 2019CVK002461D4, styled:

ESPERANZA PEREZ; GUILLERMO MARTINEZ, PLAINTIFFS  
 VS.

DOCTORS HOSPITAL OF LAREDO; UNIVERSAL HEALTH SERVICES INC.;  
 JANE DOE 1; JANE DOE 2, DEFENDANTS

Said Plaintiff's Petition was filed on 12/10/2019 in said court by:

BALDEMAR GARCIA, Jr., ATTORNEY FOR PLAINTIFF  
 602 E CALTON RD FL 2  
 LAREDO TX 78041

WITNESS ESTHER DEGOLLADO, DISTRICT CLERK OF WEBB COUNTY, TEXAS,  
 Issued and given under my hand and seal of said court at office,  
 on this the 16th day of December, 2019.

C L E R K   O F   C O U R T



BY:

Diana Vela

ESTHER DEGOLLADO  
 WEBB COUNTY DISTRICT CLERK  
 P.O. BOX 667  
 LAREDO, TX 78042

DEPUTY

2019CVK002461D4

OFFICER'S RETURN

Came to hand on the \_\_\_\_\_ day of \_\_\_\_\_, 2019 at  
\_\_\_\_\_ O'CLOCK \_\_\_\_\_ M. Executed at  
\_\_\_\_\_, within the COUNTY of \_\_\_\_\_  
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\_\_\_\_\_, 2019, by delivering to the within named  
**DOCTORS HOSPITAL OF LAREDO**, each, in person, a true copy of this  
citation together with the accompanying copy of the petition,  
having first attached such copy of such petition to such copy of  
citation and endorsed on such copy of citation the date of  
delivery.

The distance actually travelled by me in serving such process  
was \_\_\_\_\_ miles, and my fees are as follows:

Total Fee for serving this citation \$ \_\_\_\_\_.

To certify which, witness my hand officially.

SHERIFF, CONSTABLE

\_\_\_\_\_ COUNTY, TEXAS

BY \_\_\_\_\_ DEPUTY

THE STATE OF TEXAS }  
COUNTY OF WEBB }

Before me, the undersigned authority, on this day personally  
appeared \_\_\_\_\_, who after being duly  
sworn, upon oath said that a notice, of which the above is a  
true copy, was by him/her delivered to

\_\_\_\_\_ on the  
\_\_\_\_\_ day of \_\_\_\_\_.

SWORN TO AND SUBSCRIBED BEFORE ME on the \_\_\_\_\_ day of  
\_\_\_\_\_, \_\_\_\_\_, to certify which witness my hand and  
seal of office.

\_\_\_\_\_  
NOTARY PUBLIC  
MY COMMISSION EXPIRES

**RETURN**

2019CVK002461D4

CITATION

THE STATE OF TEXAS  
COUNTY OF WEBB

CALENDAR CALL COURT DATE:  
3/30/2020 AT 2:00 PM

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BY SERVING ITS REGISTERED AGENT: JIM RESENDEZ, CHIEF EXECUTIVE OFFICER  
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MARK A. REQUENA, CHIEF FINANCIAL OFFICER  
10700 MCPHERSON RD  
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VS.

DOCTORS HOSPITAL OF LAREDO; UNIVERSAL HEALTH SERVICES INC.;

JANE DOE 1; JANE DOE 2, DEFENDANTS

Said Plaintiff's Petition was filed on 12/10/2019 in said court by:

BALDEMAR GARCIA, Jr., ATTORNEY FOR PLAINTIFF

602 E CALTON RD FL 2

LAREDO TX 78041

WITNESS ESTHER DEGOLLADO, DISTRICT CLERK OF WEBB COUNTY, TEXAS,  
Issued and given under my hand and seal of said court at office,  
on this the 16th day of December, 2019.

C L E R K   O F   C O U R T

ESTHER DEGOLLADO  
WEBB COUNTY DISTRICT CLERK  
P.O. BOX 667  
LAREDO, TX 78042

Diana Vela

DEPUTY



BY:

A true copy of the original I certify  
the 16th day of December 2019  
ESTHER DEGOLLADO  
Clerk of the District Courts and  
Court of Law Webb County Texas  
Diana Vela  
BY:

OFFICERS RETURN

CAUSE # 2019 CVK 002461-D4

Received this citation on DECEMBER, 18, 2019, at 10:00, A M. Executed at 10700 WEPHERSON RD, within the County of WEBB, State of Texas, on DECEMBER, 20, 2019, at 11:00, A M., by delivering to the within named individual (s), DOCTORS HOSPITAL OF LAREDO,

%: REGISTERED AGENT: Jim Resendez

each, in person, a true copy of this citation, together with an accompanying copy of plaintiff's original petition, having first endorsed on the citation the date of delivery.

My fees for service of process are as follows:

For serving Citation	\$ _____
Other _____	\$ _____
Total Fees	\$ _____

To certify which witness my hand.

ANTONIO GUARDIOLA, Sheriff/Constable  
County of WEBB, State of Texas  
By: \_\_\_\_\_, Deputy

OR

ANTONIO GUARDIOLA, Certified Process Server  
PSC-544 Identification number  
JUNE 30, 2020 Expiration of Certification

JURAT

My name is ANTONIO GUARDIOLA, my date of birth is 12-02-54, and my address is 8982 FOGGY LP. I declare under penalty of perjury that the foregoing Return of Citation is true and correct. Executed in the County of WEBB, State of Texas, on the 20 day of DECEMBER, 2019

Antonio Guardiola  
Declarant

SWORN TO AND SUBSCRIBED BEFORE ME on the \_\_\_\_\_ day of \_\_\_\_\_ 2019, to certify which witness my hand and seal of office.

\_\_\_\_\_  
Notary Public/Court Clerk

A True copy of the original I certify

the 16th day of Jan 2020

ESTHER DEGOLLADO

Clerk of the District Courts and  
County Court at Law, Webb County, TexasCynthia M. Mabrey  
Deputy**RETURN**

2019CVK002461D4

CITATION BY CERTIFIED MAIL  
THE STATE OF TEXAS

NOTICE TO THE DEFENDANT: "YOU HAVE BEEN SUED. YOU MAY EMPLOY AN ATTORNEY. IF YOU OR YOUR ATTORNEY DO NOT FILE A WRITTEN ANSWER WITH THE CLERK WHO ISSUED THIS CITATION BY 10:00 A.M. ON THE MONDAY NEXT FOLLOWING THE EXPIRATION OF TWENTY DAYS AFTER YOU WERE SERVED THIS CITATION AND PETITION, A DEFAULT JUDGMENT MAY BE TAKEN AGAINST YOU."

TO: UNIVERSAL HEALTH SERVICES INC.  
BY SERVING CORPORATION SERVICE COMPANY  
D/B/A CSC-LAWYERS INCORPORATING SERVICE COMPANY  
211 E 7TH STREET SUITE 620  
AUSTIN TX 78701-3218

CALENDAR CALL COURT DATE:  
3/30/2020 AT 2:00 PM

DEFENDANT, IN THE HEREINAFTER STYLED AND NUMBERED CAUSE, YOU ARE HEREBY COMMANDED TO APPEAR BEFORE THE 406TH DISTRICT COURT of Webb County, Texas, to be held at the said courthouse of said county in the city of Laredo, Webb County, Texas, by filing a written answer to the Petition of Plaintiff at or before 10:00 O'CLOCK A.M. of the Monday next after the expiration of 20 days after the date of service thereof, a copy of which accompanies this citation, in the Cause #: 2019CVK002461D4, styled:

ESPERANZA PEREZ; GUILLERMO MARTINEZ, PLAINTIFFS  
VS.

DOCTORS HOSPITAL OF LAREDO; UNIVERSAL HEALTH SERVICES INC.;  
JANE DOE 1; JANE DOE 2, DEFENDANTS

Said Plaintiff's Petition was filed on 12/10/2019 in said court by:

BALDEMAR GARCIA, Jr., ATTORNEY FOR PLAINTIFF  
602 E CALTON RD FL 2  
LAREDO TX 78041

WITNESS ESTHER DEGOLLADO, DISTRICT CLERK OF WEBB COUNTY, TEXAS, issued and given under my hand and seal of said court at office, on this the 16th day of December, 2019.

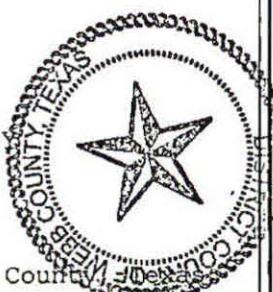
## C L E R K O F C O U R T

ESTHER DEGOLLADO, CLERK OF WEBB COUNTY, TEXAS  
P.O. BOX 667  
LAREDO, TX 78042

BY: \_\_\_\_\_

DEPUTY

DIANA VELA



## CLERK'S CERTIFICATE OF SERVICE

I, Clerk of the District Courts and County Court at Law of Webb County, Texas, certify that I executed the foregoing citation in Webb County, Texas on this the 16th day of December, 2019 by placing in the United States mail a true copy of this citation, with true copy of the aforesaid Pleading attached thereto, via Certified Mail No. 7016 1970 0000 8796 5428 ADDRESSED TO: UNIVERSAL HEALTH SERVICES INC., 211 E 7TH STREET SUITE 620, AUSTIN TX 78701-3218 and endorsed thereon "RETURN RECEIPT REQUESTED," after having first endorsed on said copy of said citation the date of mailing and the name and address of the within-named recipient, to certify which witness my hand officially on this the 16th day of December, 2019.

ESTHER DEGOLLADO  
CLERK OF THE DISTRICT COURTS AND  
COUNTY COURT-AT-LAW  
OF WEBB COUNTY, TEXAS

BY: \_\_\_\_\_

DEPUTY

Diana Vela



ATTACH EVIDENCE OF MAILING  
AND RETURN RECEIPT HERE.

A True copy of the original I certify  
 the 13th day of Jan 2020  
 ESTHER DEGOLLADO  
 Clerk of the District Courts and  
 County Court at Law of Webb County Texas  
 By *Cynthia Vela* Deputy

**SERVE**  
 2019CVK002461D4

**CITATION BY CERTIFIED MAIL**  
**THE STATE OF TEXAS**

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**TO:** UNIVERSAL HEALTH SERVICES INC.  
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 D/B/A CSC-LAWYERS INCORPORATING SERVICE COMPANY  
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ESPERANZA PEREZ; GUILLERMO MARTINEZ, PLAINTIFFS  
 VS.

DOCTORS HOSPITAL OF LAREDO; UNIVERSAL HEALTH SERVICES INC.;

JANE DOE 1; JANE DOE 2, DEFENDANTS

Said Plaintiff's Petition was filed on 12/10/2019 in said court by:

BALDEMAR GARCIA, Jr., ATTORNEY FOR PLAINTIFF  
 602 E CALTON RD FL 2  
 LAREDO TX 78041

WITNESS ESTHER DEGOLLADO, DISTRICT CLERK OF WEBB COUNTY, TEXAS, issued and given under my hand and seal of said court at office, on this the 16th day of December, 2019.

C L E R K O F C O U R T

ESTHER DEGOLLADO, CLERK OF WEBB COUNTY, TEXAS  
 P.O. BOX 667  
 LAREDO, TX 78042

BY:

DIANA VELA

DEPUTY



**CLERK'S CERTIFICATE OF SERVICE**

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ESTHER DEGOLLADO  
 CLERK OF THE DISTRICT COURTS AND  
 COUNTY COURT-AT-LAW  
 OF WEBB COUNTY, TEXAS

ATTACH EVIDENCE OF MAILING  
 AND RETURN RECEIPT HERE.

BY:

Diana Vela



A True copy of the original I certify

the 15th day of Jan 2020

ESTHER DEGOLLADO

Clerk of the District Courts and  
County Court-at-Law, Webb County, TexasAndrea M. Vela  
Deputy

RETURN

2019CVK002461D4

CITATION BY CERTIFIED MAIL  
THE STATE OF TEXAS

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ESPERANZA PEREZ, GUILLERMO MARTINEZ, PLAINTIFFS

VS.

O; UNIVERSAL HEALTH SERVICES INC.;  
JANE DOE 2, DEFENDANTS10/2019 in said court by:  
BY FOR PLAINTIFF

U.S. Postal Service™  
CERTIFIED MAIL® RECEIPT  
Domestic Mail Only

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 Return Receipt (electronic) \$  
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 Adult Signature Required \$  
 Adult Signature Restricted Delivery \$

Postage: \$  
Total Postage or \$  
Sent To: UNIVERSAL HEALTH SERVICES INC.  
BY SERVING CORPORATION SERVICE  
COMPANY D/B/A CSC-LAWYERS  
INCORPORATING SERVICE COMPANY  
Street and Apt. No: 211 E. 7TH STREET, SUITE 620  
City, State, Zip: AUSTIN, TX 78701-3218

PS Form 3800, April 2015 PSN 7530-02-000-0047 See Reverse for Instructions

OF WEBB COUNTY, TEXAS, issued and given under my hand  
the 16th day of December, 2019.OF COURT  
COUNTY, TEXAS

DIANA VELA

DEPUTY

## CERTIFICATE OF SERVICE

I, Clerk of the District Courts and County Court at Law of Webb County, Texas, certify that I executed the foregoing citation in Webb County, Texas on this the 16th day of December, 2019 by placing in the United States mail a true copy of this citation, with true copy of the aforesaid Pleading attached thereto, via Certified Mail No. 7016 1970 0000 8796 5428 ADDRESSED TO: UNIVERSAL HEALTH SERVICES INC., 211 E 7TH STREET SUITE 620, AUSTIN TX 78701-3218 and endorsed thereon "RETURN RECEIPT REQUESTED," after having first endorsed on said copy of said citation the date of mailing and the name and address of the within-named recipient, to certify which witness my hand officially on this the 16th day of December, 2019.

ESTHER DEGOLLADO  
CLERK OF THE DISTRICT COURTS AND  
COUNTY COURT-AT-LAW  
OF WEBB COUNTY, TEXAS

BY: Diana Vela DEPUTY

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